

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ERIC KELLEY,

Plaintiff,

v.

RICHARD REYES, LOUIS STELL,
ROBERT SMITH, ESTATE OF MICHAEL
FINER, ALEX NIEVES, PETER IURATO,
TIMOTHY JORDAN, RAYMOND REID,
ALBERT CLARK, *in their individual
capacities*, RICHARD MUNSEY and
VINCENT AMORESANO, *in their
individual and official capacities*, and THE
CITY OF PATERSON,

Defendants.

Civil Action No. 19-cv-17911
(WSJ) (JSA)

RALPH LEE, JR.,

Plaintiff,

v.

ALBERT CLARK, ESTATE OF MICHAEL
FINER, PETER IURATO, TIMOTHY
JORDAN, ALEX NIEVES, RAYMOND
REID, RICHARD REYES, ROBERT
SMITH, LOUIS STELL, and JOHN DOES
#1-10 *in their individual capacities*,
RICHARD MUNSEY and VINCENT
AMORESANO, *in their individual and
official capacities*, and THE CITY OF
PATERSON,

Defendants.

Civil Action No. 19-cv-17936
(WSJ) (JSA)

PLAINTIFFS' MOTION FOR LEAVE TO REDACT

Pursuant to Local Civil Rule 5.3 and the Court's Order of December 9, 2024 (*Kelley*, ECF No. 254; *Lee*, ECF No. 228), Plaintiffs move for leave to redact minimal sensitive personal identifying and financial information from exhibits Plaintiffs filed in response to Defendants' motions for summary judgment (*Kelley*, ECF No. 233; *Lee*, ECF No. 207). Plaintiffs understand that Defendants determined they needed to seek additional time to respond to the Court's Order, *see Kelley*, ECF No. 255; *Lee*, ECF No. 229, and therefore, the parties determined they would proceed separately.

Plaintiffs seek leave to redact all social security numbers, home addresses, dates of birth, and financial account numbers included in each of Plaintiffs' exhibits, as required by Federal Rule of Civil Procedure 5.2. As to Exhibit 146 specifically, Plaintiff proposes redacting the information listed above, as well as personal and financial information including Social Security grant benefit amounts, a listed date which directly indicates one Plaintiff's date of birth, the name of a financial institution, and certain portions of annotated text, which, if filed on the public docket, would expose personal and private medical information. Plaintiffs submit a copy of Exhibit 146 with proposed redactions, attached hereto as Exhibit 1, for the Court's consideration.

DATED: December 23, 2024

Respectfully submitted,

/s/ Nick Brustin

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**Admitted Pro Hac Vice*